

ALLEN PATATANYAN, SBN 210586  
allen@westcoasttriallawyers.com  
NEAMA RAHMANI, SBN 223819  
nr@westcoasttriallawyers.com  
RONALD L. ZAMBRANO, SBN 255613  
ron@westcoasttriallawyers.com  
WEST COAST TRIAL LAWYERS, APLC  
350 South Grand Avenue, Suite 3350  
Los Angeles, CA 90071  
Telephone: 213.927.3700  
Facsimile: 213.927.3701

Attorneys for Plaintiff,  
LASHEEM BARTON

THEANE EVANGELIS, SBN 243570  
tevangelis@gibsondunn.com  
BLAINE H. EVANSON, SBN 254338  
bevanson@gibsondunn.com  
HEATHER L. RICHARDSON, SBN 246517  
hrichardson@gibsondunn.com  
BRANDON J. STOKER, SBN 277325  
bstoker@gibsondunn.com  
SAMUEL ECKMAN, SBN 308923  
seckman@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

Attorneys for Defendant  
UBER TECHNOLOGIES, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JERICHO NICOLAS, individually and on  
behalf of other similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendants.

Case No.: 4:19-cv-08228-PJH

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO DISMISS THE ENTIRE ACTION OF  
ALL PARTIES AND ALL CAUSES OF  
ACTION WITH PREJUDICE**

Judge: Phyllis J. Hamilton

**STIPULATION**

Plaintiffs Jericho Nicolas and others similarly situated, and Defendant Uber Technologies, Inc., by and through their counsel of record, respectfully submit this Stipulation pursuant to the Court's January 2, 2025, order.

On July 17, 2020, the Court granted Defendant's motion to compel arbitration with respect to the Labor Code § 2698 et seq. (PAGA) claims brought by 45 Plaintiffs and stayed those claims pending arbitration.

On May 20, 2021, the Court granted Defendant's motion to dismiss all remaining claims brought by Plaintiffs Mark Glinoga, Alexis Gonzalez, and Kevin Neely with prejudice.

On October 11, 2024, the parties updated the Court that all but four of the remaining Plaintiffs had released their claims or never drove using Uber. Uber proposed that the 41 Plaintiffs that had either released their claims or never drove using Uber should be dismissed, and Plaintiffs did not oppose.

On December 13, 2024, the parties updated the Court that Plaintiffs' counsel had concluded their investigation as to the four remaining Plaintiffs, and Plaintiffs agreed that all Plaintiffs except for Lasheem Barton should be dismissed with prejudice.

On January 2, 2025, the Court ordered Plaintiff LASHEEM BARTON (hereinafter "BARTON") to initiate arbitration proceedings or face dismissal for failure to prosecute.

On January 9, 2025, the parties submitted to the Court a Stipulation to Dismiss all Plaintiffs except for BARTON.

Plaintiff BARTON—the last remaining Plaintiff in this action—and Defendant UBER TECHNOLOGIES, INC. (hereinafter collectively referred to as "Defendant"), acting through counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement executed by them, to the Dismissal With Prejudice of this action, including all claims and counterclaims stated herein against all parties, with each party to bear its own attorney's fees and costs.

1 Dated: February 14, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

2  
3 By: /s/ Ronald L. Zambrano

4 Ronald L. Zambrano, Esq.  
5 Attorneys for Plaintiff,  
6 LASHEEM BARTON

7 Dated: February 14, 2025

GIBSON, DUNN & CRUTCHER LLP

8  
9 By: /s/

10 Theane Evangelis  
11 Attorneys for Defendant,  
12 UBER TECHNOLOGIES, INC.  
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STIPULATION AND ORDER TO DISMISS THE ENTIRE ACTION

**~~PROPOSED~~ ORDER**

Pursuant to the stipulation of the parties under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), IT IS ORDERED THAT THIS ACTION BE, AND HEREBY IS, DISMISSED WITH PREJUDICE as to all claims and counterclaims stated herein against all parties, with each party to bear its own attorney's fees and costs.

Dated: February 14, 2025

Phyllis J.  
United States



**FILER'S ATTESTATION**

I, Ronald Zambrano, am the ECF user whose identification and password are being used to file this Stipulation for Dismissal on behalf of Plaintiff LASHEEM BARTON and Defendant UBER TECHNOLOGIES, INC. Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the signatories.

Dated: February 14, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

By: /s/ Ronald Zambrano  
Ronald L. Zambrano, Esq.  
Attorneys for Plaintiff,  
LASHEEM BARTON